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October 26, 2023

VIA ECF

The Honorable Judge Margo K. Brodie
United States District Court—E.D.N.Y.
225 Cadman Plaza East
Brooklyn, NY 11201

RE: Green Mountain Holdings (Cayman) LTD v. 501 Lafayette Ave LLC et al.,
Civil Action No. 21-cv-5844-MKB-TAM

Dear Judge Brodie:

We represent Green Mountain Holdings (Cayman) LTD (“Plaintiff”) in the above-referenced commercial foreclosure action. Please accept this letter in response to Your Honor’s Order at Docket No. 33, which denied Plaintiff’s Motion for default judgment of foreclosure and sale and seeking information regarding Plaintiff’s compliance with RPAPL §§1303 and 1320.

Plaintiff respectfully requests that it be permitted to file a renewal Motion for default judgment of foreclosure and sale, within which Plaintiff will address the issues raised by Your Honor as to the status of the loan as a commercial loan and associated inapplicability of various RPAPL requirements.

We thank the Court for its review of our submission.

Respectfully Submitted,

By: /s/Alan H. Weinreb
Alan H. Weinreb, Esq.

cc: Elliott Schlissel, Esq., attorney for Defendants (via ECF)

WE ARE A DEBT COLLECTOR AND ARE ATTEMPTING TO COLLECT A DEBT.
ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.